From:	Ingrid Deklau
To:	LeDoux, Erica; Braganza, Bonnie; khong@harvestmidstream.com; Walter Konkel; Ingrid Deklau
Subject:	Ojito Compressor Station-Waukesha Data Sheet and Steps Forward (based on yesterday"s call)
Date:	Tuesday, August 27, 2019 4:46:35 PM
Attachments:	Ojito NSR True Minor Source Emissions 08.26.19.pdf Ojito Waukesha 7042GL Engine Spec Sheet.pdf

Erica and Bonnie – As we discussed, Harvest Four Corners, LLC intends to install a total of three Waukesha 7042GL compressor engines at the Ojito Compressor Station. Each Waukesha engine will be equipped with a low-speed turbocharger providing for a maximum design rating of 1,232 bhp, which is equivalent to a site-rating of 1,097 bhp at Ojito's site elevation of 6,960 feet ASL. Based on the engine's site-rated horsepower and manufacturer's not to exceed emission rates of 1.5 g NOx/bhp-hr, 2.65 g CO/bhp-hr and 1.0 g VOC/bhp-hr, the Ojito Compressor Station will be a true minor source as shown by the attached PTE calculations.

The attached Waukesha engine data sheet shows the 7042GL model, equipped with a low-speed turbocharger and operating with an intercooler water temperature of 130F, can achieve a maximum design rating of 1,232 bhp. The turbocharger is shown as standard equipment. The low-speed turbocharger is inherent process equipment (part of the physical and operational design of the engine) rather than control equipment, and the emissions reduction associated with going from a high-speed to low-speed turbocharger should be incorporated into the source's PTE without the need to make these reductions legally and practically enforceable.

As regards the applicability of NESHAP ZZZZ and NSPS JJJJ to the engines, each four-stroke lean-burn engine was manufactured prior to 2006 and has not been modified/reconstructed since the manufacture date. The installation of a low-speed turbocharger on the engine does not constitute a modification as the definition of modification found in 40 CFR §60.2 states *modification means any physical change in, or change in the method of operation of, an existing facility which increases the amount of any air pollutant (to which a standard applies) emitted into the atmosphere by that facility or which results in the emission of any air pollutant (to which a standard applies) into the atmosphere not previously emitted.* The installation of a low-speed turbocharger does not increase the amount of any air pollutant emitted in the atmosphere nor does it result in the emission of any air pollutant not previously emitted. Due to the engines construction dates, and the fact that they have not been modified/reconstructed, they are considered "existing" units under NESHAP ZZZZ and not subject to NSPS JJJJ.

Steps forward:

- Please review the information submitted with this e-mail regarding operation of the Waukesha 7042GL engine with low-speed turbocharger and associated emissions. With EPA's concurrence that the Ojito Compressor Station consisting of three Waukesha 7042GL engines and ancillary equipment is a true minor source, Harvest will submit the Part 1 Registration form for Unit 3.

- Harvest will submit the following documents to you this week:
    1. Re-submittal of ESA/NHPA forms, showing current species list. Note, there are no changes to the listed T&E species included in the original submittal with Unit 1.
    2. Revised Part 2 Registration for Unit 1.
    3. Part 2 Registration for Unit 2.

Thank you so much for your time yesterday. Please call Walter (805-964-7597) or me if you need additional information.

Ingrid

385-414-4650 (cell)